

**Mental Health Providers of
Western Queens, Inc.**

STANDARDS OF CONDUCT

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Mental Health Providers of Western Queens, Inc. (the “**Company**”) has a policy of maintaining the highest level of professional and ethical standards in the conduct of its business. The Company places the highest importance upon its reputation for honesty, integrity and high ethical standards. The Company is responsible to its patients and others who have placed faith in our organization. To uphold this trust, we have developed our Standards of Conduct based upon ideals in core areas.

These Standards of Conduct can only be achieved and sustained through the actions and conduct of all persons associated with the Company, from its Governing Authority to its front-line staff and contractors. Each and every employee, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, members of the Governing Authority and corporate officers (collectively, “**Affected Individuals**”) is obligated to conduct himself/herself in a manner to ensure the maintenance of these standards. Such actions and conduct will be important factors in evaluating an Affected Individual’s judgment and competence, and an important element in the evaluation of an Affected Individual's performance. Affected Individuals who ignore or disregard the principles of this Standards of Conduct will be subject to appropriate disciplinary actions.

Integrity and Accountability

To meet our commitment to integrity and accountability in all circumstances, we will:

- Demonstrate good stewardship of Company resources, including membership dues, grants and other contributions and remuneration for services rendered that is used to pay operating expenses, salaries, and employee benefits.
- Refrain from using organizational resources for non-Company purposes.
- Strive to meet the highest standards of performance, quality, service and achievement in working towards our mission.
- Fully comply with all laws and regulations affecting the Company.
- Exhibit respect and fairness toward all those with whom we come into contact.
- Communicate honestly and openly and avoid misrepresentation.
- Promote a working environment where honesty, open communication and all opinions are valued.

Conflicts of Interest

Company staff, Board members and representatives¹ will adhere to federal and state law and regulations with regard to conflict of interest and, will avoid any conflict of interest, or the appearance of a conflict of interest, which could tarnish the reputation of the Company.

Company staff and representatives will:

- Avoid any activity or outside interest which conflicts or appears to conflict with the best interests of the Company, including involvement with a current or potential Company vendor, grantee, or competing organization, unless disclosed to and not deemed to be inappropriate by, the Company Board Ethics Officer or, as appropriate, the Board of Directors.

¹ Representatives would include paid consultants and others who may be called upon to speak or act on behalf of the Company.

- Ensure that outside employment and other activities do not adversely affect the performance of their Company duties or the achievement of the Company's mission.
- Ensure that only travel and related expenses that are incurred for legitimate Company business are reimbursed.
- Decline any gift, gratuity or favor in the performance of Company duties except for promotional items of nominal value, and any food, transportation, lodging or entertainment, unless directly related to Company business.
- Refrain from influencing the selection of staff, consultants or vendors who are relatives or personal friends or affiliated with, employ, or employed by a person with whom they have a relationship that adversely affects the appearance of impartiality.

Diversity and Equal Opportunity

The Company is an equal opportunity employer and is committed to the principle of diversity. We therefore:

- Value, champion, and embrace diversity in all aspects of Company activities.
- Respect individuals and organizations without regard to race, religion, color, creed, age, sex, gender, national origin or ancestry, marital status, veteran status, sexual orientation, or status as a qualified disabled or handicapped individual.
- Support equal employment opportunities at the Company.
- Promote diversity among our Board and staff, volunteers, programs, services, donors, suppliers and partners.

Confidentiality and Privacy

Confidentiality is a hallmark of professionalism and integrity. We therefore:

- Ensure that all information, which is confidential, privileged or nonpublic, is not disclosed inappropriately.
- Respect the privacy rights of all individuals in the performance of their Company duties.

Solicitation and Voluntary Giving

We support the right of contributors to become informed and involved. We therefore:

- Promote voluntary giving in dealing with donors and vendors.
- Refrain from and discourage any use of coercion in fundraising activities, including predicated professional advancement on response to solicitations.

Political Contributions

The Company encourages individual participation in civic affairs. However, as a charitable organization, the Company may not make contributions to any candidate for public office or political committee and may not intervene in any political campaign on behalf of or in opposition to any candidate for public office. We therefore:

- Refrain from making any contributions to any candidate for public office or political committee on behalf of the Company.
- Refrain from making any contributions to any candidate for public office or political committee in a manner that may create the appearance that the contribution is on behalf of the Company.
- Refrain from using any organizational financial resources, facilities or personnel to endorse or oppose a candidate for public office.

- Clearly communicate that we are not acting on behalf of the organization, if identified as an official of the Company, while engaging in political activities in an individual capacity.
- Refrain from engaging in political activities in a manner that may create the appearance that such activity is by or on behalf of the Company.

Adherence to Applicable Laws and Regulations, Prevention of Fraud, Waste and Abuse, and Billing and Payment Integrity

Affected Individuals must be cognizant of all applicable federal and state laws and regulations that apply to and impact upon the Company in the provision of services, documentation, billing functions, and the day-to-day activities of the Company and its employees and agents. This includes requirements regarding confidentiality of personal health information. Each Affected Individual who is materially involved in the provision of services, documentation, coding or billing functions has an obligation to familiarize himself or herself with all such applicable laws and regulations, and to adhere at all times to the requirements thereof. Where any question or uncertainty regarding these requirements exists, it is incumbent upon, and the obligation of, each Affected Individual to seek guidance from a knowledgeable officer of the Company, such as the Chief Compliance Officer.

The Company bills only for services that are actually ordered, accurately coded and documented, and medically necessary. It is the responsibility of every Affected Individual to be familiar with the requirements of applicable federal and state laws, rules and regulations, and to be sensitive to any situations that may violate such requirements and their obligation to report such violations. Claims of ignorance, good intentions and bad advice are not acceptable as excuses for non-compliance. Those in supervisory positions have the additional responsibility to verify that supervised personnel understand and comply with the standards of professional and business conduct set forth in this Standards of Conduct.

Guidance and Disclosures

Volunteers, staff, and representatives are encouraged to seek guidance from the Ethics and Compliance Officer, James McQuade, concerning the interpretation or application of this Standards of Conduct and compliance obligations and expectations. Any known or possible breaches of the Standards of Conduct must be disclosed.

Staff and representatives should contact the President or the Ethics and Compliance Officer and as appropriate a member of the Board. Volunteers should contact the Ethics and Compliance Officer or as appropriate the Executive Director or a member of the Board. Reports of possible breaches will be handled in the following manner:

- All reports of possible breaches will be treated with confidence as much as the organization's duty to investigate and the law allow. If confidentiality cannot be maintained, the individual disclosing the possible Breach will be notified.
- Reports of suspected or potential non-compliance with applicable laws, rules and regulations will be addressed pursuant to the organization's Compliance Program.
- All reported breaches will be investigated and, if needed, appropriate action taken based upon the policies of the organization.

- Retaliation and intimidation against a person who suspects and reports a breach in good faith will be treated as an independent breach of this Code, and will be subject to the policy against retaliation and intimidation set forth in the Compliance Program.
- The Company affirms prompt and fair resolution of all reportable breaches.